

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA

VS.

NATHAN NICHOLS  
RICHARD NUNEZ  
DOUGLAS WELLS  
RICHARD CONLON

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CRIMINAL NO. C-20-941

**DEFENDANT NATHAN NICHOLS'**  
**REQUEST FOR DISCLOSURE OF EXPERT WITNESSES**

Pursuant to Rule 16(G) of the Federal Rules of Criminal Procedure, Defendant Nathan Nichols requests that the government be required to give Defendant a written summary of any testimony that the government intends to use under Rule 702, 703 or 705 of the Federal Rules of Evidence. Defendant requests that the summary describe the witness's opinions, the bases and reasons for these opinions, and the witness's qualifications.

Respectfully submitted,

/s/ Hector Canales

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**ATTORNEYS FOR DEFENDANT  
NATHAN NICHOLS**

**CERTIFICATE OF CONSULTATION**

I, Hector Canales, certify that on the 11<sup>th</sup> day of September 2020, I emailed a copy of the Defendant Nathan Nichols' Request for Disclosure of Expert Witnesses to AUSA Neel Kapur and asked him whether or not he opposed the Motion. Mr. Kapur did not respond prior to filing however it is presumed that the Government is opposed.

/s/ Hector Canales  
Hector Canales

**CERTIFICATE OF SERVICE**

I certify that on this, the 11<sup>th</sup> day of September, 2020, a true and correct copy of the foregoing document was forwarded to the following counsel of record via the Court's CM/ECF system:

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/s/ Hector Canales

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